

JEFFREY S. CHIESA

Attorney General of New Jersey
Attorney for Petitioner
State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, New Jersey 08401

By: Robert A. Moncrief Jr.
Deputy Attorney General
(609) 317-6218

STATE OF NEW JERSEY
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 12-0682-EL

STATE OF NEW JERSEY, DEPARTMENT)	
OF LAW AND PUBLIC SAFETY,)	
DIVISION OF GAMING ENFORCEMENT,)	
)	
Petitioner,)	Civil Action
)	
v.)	PETITION FOR
)	PLACEMENT ON
Joseph Nunn,)	EXCLUSION LIST
)	
Respondent.)	
)	

Petitioner, State of New Jersey, Department of Law and Public Safety, Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic City, New Jersey, 08401 says:

1. Respondent, Joseph Nunn ("Nunn"), is a New Jersey resident, and currently resides at [REDACTED].

2. N.J.A.C. 13:69G-1.3(a)3 authorizes the exclusion from a licensed casino establishment of:

Any person who has been convicted of a criminal offense under the laws of any state, or of the United States, which is punishable by more than six months of incarceration, or who has been convicted of any crime or offense involving moral turpitude, and whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein.

3. N.J.A.C. 13:69G-1.3(a)4 authorizes the exclusion of any person:

whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including

iii Persons who pose a threat to the safety of the patrons or employees of a casino licensee

iv. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees

4. On March 23, 2012, Nunn was convicted of Unlawful Possession of a Handgun, in violation of N.J.S.A. 2C:39-5b, which is an offense punishable by more than 6 months incarceration. As a result of that conviction Nunn was sentenced to 2 years probation.

5. In addition to the conviction referenced in Paragraph 4 Nunn has been arrested 16 times, each listed below, between 2011 and 2012 with 14 of those arrests occurring on Atlantic City casino property.

- A. October 2, 2011 arrest by Atlantic City Police Department ("ACPD") and subsequent conviction for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, and Simple Assault, in violation of N.J.S.A. 2C:12-1 resulting in a 2 year barment from the Pier at Caesars.
- B. October 2, 2011, arrest by New Jersey State Police Casino Enforcement ("NJSPCE") and subsequent conviction for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, resulting in a 2 year barment from the Taj Mahal.
- C. October 2, 2011, arrest by ACPD and subsequent conviction for Harassment, in violation of N.J.S.A. 2C:33-4.
- D. October 2, 2011, arrest by ACPD and subsequent conviction for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, resulting in a 2 year barment from Tropicana.
- E. October 3, 2011, arrest by ACPD and subsequent conviction for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, resulting in a 2 year barment from Resorts.
- F. October 3, 2011, arrest by NJSPCE and subsequent conviction for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b.
- G. October 4, 2011, arrest by ACPD and subsequent conviction for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, resulting in 15 days incarceration and a 2 year barment from Resorts.
- H. October 4, 2011, arrest by ACPD and subsequent conviction for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, resulting in

15 days incarceration and a 2 year barment from the Pier at Caesars.

- I. January 27, 2012, arrest by ACPD for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, at Caesars with disposition pending.
- J. January 28, 2012, arrest by ACPD for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, at the Pier at Caesars with disposition pending.
- K. January 28, 2012, arrest by NJSPCE for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, at Showboat with disposition pending.
- L. January 29, 2012, arrest by NJSPCE for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, at Showboat with disposition pending.
- M. January 31, 2012, arrest by NJSPCE for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, at Showboat with disposition pending.
- N. February 1, 2012, arrest by NJSPCE for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, at Trump Taj Mahal with disposition pending.
- O. February 1, 2012, arrest by NJSPCE for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, and Disorderly conduct in violation of N.J.S.A. 2C:33-2, at Trump Taj Mahal with disposition pending.
- P. February 1, 2012, arrest by NJSPCE for Defiant Trespass, in violation of N.J.S.A. 2C:18-3b, at Showboat with disposition pending and an outstanding bench warrant for failure to appear

6. Based on the information set forth in Paragraphs 1 through 5 of this Petition, Nunn has been convicted of an offense punishable by more than 6 months incarceration and is a person whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to N.J.A.C. 13:69G-1.3(a) 3.

7. Based on the information set forth in Paragraphs 1 though 5 of this Petition, Nunn is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to N.J.A.C. 13:69G-1.3(a)4.

WHEREFORE, Petitioner demands the following relief against Respondent:

A. Judgment that Respondent, Joseph Nunn, has been convicted of an offense punishable by more than 6 months of incarceration and is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C. 13:69G-1.3(a)3; and

B. Judgment that Respondent, Joseph Nunn, is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C. 13:69G-1.3(a)4; and


C. Judgment entering a final order placing Respondent, Joseph Nunn on the exclusion list pursuant to N.J.S.A. 5:12-71 and N.J.A.C. 13:69G-1.3(a)3; and

D. Judgment entering a final order placing Respondent, Joseph Nunn, on the exclusion list pursuant to N.J.S.A. 5:12-71 and N.J.A.C.13:69G-1.3(a)4; and

E. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

JEFFREY S. CHIESA
Attorney General of New Jersey

By: 
Robert A. Moncrief Jr.
Deputy Attorney General

Dated: September 13, 2012